

## **Exhibit D**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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MERRILL STEINBERG, Individually, and On	:	
Behalf of All Others Similarly Situated,	:	
	:	Electronically Filed
Plaintiff,	:	
	:	Civil Action No.: 1:07-cv-09615-RPP
v.	:	(ECF Case)
	:	
ERICSSON LM TELEPHONE CO., CARL-	:	Hon. Robert P. Patterson
HENRIK SVANBERG and KARL-HENRIK	:	
SUNDSTROM,	:	
	:	
Defendants.	:	
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<i>(Additional Captions on the Following Page)</i>		

**JOINT DECLARATION OF GEIK DREVER, DOMINIQUE LIENART, HELGE  
KLOSE and DR. MANFRED NUSKE, AND DANIEL J. GREENE IN SUPPORT OF  
THE MOTION OF THE ERICSSON INSTITUTIONAL INVESTOR GROUP FOR  
APPOINTMENT AS LEAD PLAINTIFF, APPROVAL OF THEIR SELECTION OF  
LEAD COUNSEL, AND CONSOLIDATION OF ALL RELATED ACTIONS**

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 STATE-BOSTON RETIREMENT SYSTEM, :  
 Individually, and On Behalf of All Others :  
 Similarly Situated, :

Plaintiff, :

v. :

ERICSSON LM TELEPHONE CO., CARL- :  
 HENRIK SVANBERG and KARL-HENRIK :  
 SUNDSTROM, :

Defendants. :

Electronically Filed

Civil Action No.: 1:07-cv-10659-RPP  
 (ECF Case)

Hon. Robert P. Patterson

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 CITY OF EDINBURGH COUNCIL ON :  
 BEHALF OF THE LOTHIAN PENSION :  
 FUND, FORTIS INVESTMENT :  
 MANAGEMENT N.V./S.A., and DEKA :  
 INVESTMENT GMBH, Individually, and On :  
 Behalf of All Others Similarly Situated, :

Plaintiff, :

v. :

ERICSSON LM TELEPHONE CO., CARL- :  
 HENRIK SVANBERG and KARL-HENRIK :  
 SUNDSTROM, :

Defendants. :

Electronically Filed

Civil Action No.: 1:07-cv--RPP  
 (ECF Case)

Hon. Robert P. Patterson

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GEIK DREVER, DOMINIQUE LIENART, HELGE KLOSE, DR. MANFRED NUSKE, and DANIEL J. GREENE, pursuant to 28 U.S.C. § 1746, declare as follows:

1. We respectfully submit this Declaration in support of the motion of the City of Edinburgh Council on behalf of the Lothian Pension Fund (“Lothian”), Fortis Investment Management N.V./S.A. (“Fortis Investments”), Deka Investment GMBH (“Deka”), and the State-Boston Retirement System (“Boston”) (collectively, the “Ericsson Institutional Investor Group”) for appointment as Lead Plaintiff, approval of their selection of Labaton Sucharow LLP (“Labaton Sucharow”) as Lead Counsel for the Class, and for consolidation of all related actions. We each have personal knowledge about the information in this Joint Declaration relating to the institutional investors with which we are associated.

**GEIK DREVER ON BEHALF OF LOTHIAN**

2. I am the Head of Investment & Pensions of Lothian, and am duly authorized to execute this declaration. Currently, Lothian has total assets of approximately £2.98 billion. As reflected in its Certification, Lothian purchased significant amounts of Ericsson securities between February 2, 2007 and November 20, 2007 (the “Class Period”) and suffered a substantial loss as a result of the violations of the federal securities laws alleged in this Action.

3. When Lothian decides that it should serve as Lead Plaintiff in a securities class action, and is so appointed, it monitors the litigation and keeps regular contact with our outside counsel.

4. Lothian is capable of actively participating in this action and is committed to doing so. Lothian has ample resources to actively monitor and control its ongoing securities class action litigation. Our outside counsel provides frequent reports to us. Lothian expects to participate in responding to discovery, including producing documents and providing

appropriate representatives to testify in depositions. When necessary, a representative from Lothian will attend significant Court hearings and settlement conferences.

5. I understand that Congress enacted the Private Securities Litigation Reform Act of 1995 (the "Reform Act") to place responsibility for managing securities class actions in the hands of established institutional investors, such as Lothian and the Ericsson Institutional Investor Group. If appointed lead plaintiff, Lothian will monitor and control the litigation as required under the Reform Act.

6. After due consideration Lothian selected Labaton Sucharow to represent it in this Action, and respectfully requests that the Court approve our selected counsel as lead counsel for the Class. Lothian selected lead counsel and negotiated the terms of lead counsel's retention, including the appropriate parameters for any fee application.

7. Lothian has spoken with representatives of Fortis Investments, Deka, and Boston regarding this case and the lead plaintiff motion. Lothian believes the Class will be best served by the appointment of the Ericsson Institutional Investor Group as lead plaintiff because, like the Class, the Ericsson Institutional Investor Group is comprised of U.S. and international members.

**DOMINIQUE LIENART ON BEHALF OF FORTIS INVESTMENTS**

8. I am the General Secretary – Head of Legal of Fortis Investments and am duly authorized to execute this declaration as a representative of Fortis Investments. Fortis Investments currently has total assets exceeding 100 billion euros. As reflected in its Certification, Fortis Investments purchased significant amounts of Ericsson securities during the Class Period and suffered a substantial loss as a result of the violations of the federal securities laws alleged in this Action.

9. When Fortis Investments decides that it should serve as Lead Plaintiff in a securities class action, and is so appointed, it monitors the litigation and keeps regular contact with our outside counsel.

10. Fortis Investments is capable of actively participating in this action and is committed to doing so. Fortis Investments has ample resources to actively monitor and control its ongoing securities class action litigation. Our class action counsel provides frequent reports to us. Fortis Investments will participate in responding to discovery, including producing documents and providing appropriate representatives to testify in depositions. When necessary, a representative from Fortis Investments will attend significant Court hearings and settlement conferences.

11. The monitoring and control over the litigation which we are committed to performing in this Action are necessary and appropriate because of the scope of the Lead Plaintiff's responsibilities under the Reform Act. I understand that Congress enacted the Reform Act to place responsibility for managing securities class actions in the hands of established institutional investors, such as the Ericsson Institutional Investor Group.

12. After due consideration Fortis Investments selected Labaton Sucharow to represent it in this Action, and respectfully requests that the Court approve our selected counsel as lead counsel for the Class. Fortis Investments has selected lead counsel and negotiated the terms of lead counsel's retention, including the appropriate parameters for any fee application.

13. Fortis Investments has spoken with representatives of Lothian, Deka, and Boston regarding this case. Fortis Investments believes the Class will be best served by the appointment of the Ericsson Institutional Investor Group as lead plaintiff because, like the Class, the Ericsson Institutional Investor Group is comprised of U.S. and international members.

**HELGE KLOSE and DR. MANFRED NUSKE ON BEHALF OF DEKA**

14. I, Helge Klose, am Senior Vice President of Client Services at Deka and am duly authorized to execute this declaration as a representative of Deka. I, Dr. Manfred Nuske, am Managing Director at Deka and am duly authorized to execute this declaration as a representative of Deka. Deka currently has total assets of approximately €150 billion. As reflected in its Certification, Deka purchased significant amounts of Ericsson securities during the Class Period and suffered a substantial loss as a result of the violations of the federal securities laws alleged in this Action.

15. When Deka decides that it should serve as Lead Plaintiff in a securities class action, it monitors the litigation and keeps regular contact with our outside counsel.

16. Deka is capable of actively participating in this action and is committed to doing so. Deka has ample resources to actively monitor and control its ongoing securities class action litigation. Our class action counsel provide frequent reports to us. Deka will participate in responding to discovery, including producing documents and providing appropriate representatives to testify in depositions. When necessary, a representative from Deka will attend significant Court hearings and settlement conferences.

17. Deka understands that the monitoring and control over the securities class actions in which it serves as Lead Plaintiff are necessary and appropriate because of the scope of the Lead Plaintiff's responsibilities the Reform Act. We understand that Congress enacted the Reform Act to place responsibility for managing securities class actions in the hands of established institutional investors, such as the Ericsson Institutional Investor Group.

18. After due consideration Deka selected Labaton Sucharow to represent it in this Action, and respectfully requests that the Court approve our selected counsel as lead counsel for



the Class. Deko has selected lead counsel and negotiated the terms of lead counsel's retention, including the appropriate parameters for any fee application.

19. Deko has spoken with representatives of Lothian, Fortis Investments, and Boston regarding this case. Deko believes the Class will be best served by the appointment of the Ericsson Institutional Investor Group as lead plaintiff because, like the Class, the Ericsson Institutional Investor Group is comprised of U.S. and international members.

**DANIEL J. GREENE ON BEHALF OF BOSTON**

20. I am the Assistant Executive Officer of Boston and am duly authorized to execute this declaration as a representative of Boston. Boston duly authorized Robert E. Tierney to execute its Certification. Boston currently has total assets of approximately \$3.2 billion. As reflected in its Certification, Boston purchased significant amounts of Ericsson securities during the Class Period and suffered a substantial loss as a result of the violations of the federal securities laws alleged in this Action.

21. When Boston decides that it should serve as Lead Plaintiff in a securities class action, and is so appointed, it monitors the litigation and keeps regular contact with our outside counsel.

22. Boston is capable of actively participating in this action and is committed to doing so. Boston has ample resources to actively monitor and control its ongoing securities class action litigation. Our class action counsel provide frequent reports to Boston. Boston will participate in responding to discovery, including producing documents and providing appropriate representatives to testify in depositions. When necessary, a representative from Boston will attend significant Court hearings and settlement conferences.



23. Boston understands that the monitoring and control over the securities class actions in which it serves as Lead Plaintiff are necessary and appropriate because of the scope of the Lead Plaintiff's responsibilities under the Reform Act. I understand that Congress enacted the Reform Act to place responsibility for managing securities class actions in the hands of established institutional investors, such as the Ericsson Institutional Investor Group.

24. After due consideration Boston selected Labaton Sucharow to represent it in this Action, and respectfully requests that the Court approve our selected counsel as lead counsel for the Class. Boston has selected lead counsel and negotiated the terms of lead counsel's retention, including the appropriate parameters for any fee application.

25. Boston has spoken with representatives of Lothian, Fortis Investments, and Dekan regarding this case. Boston believes the Class will be best served by the appointment of the Ericsson Institutional Investor Group as lead plaintiff because, like the Class, the Ericsson Institutional Investor Group is comprised of U.S. and international members.

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26. On December 21, 2007, representatives from each of our institutions participated in a conference call together with our counsel Labaton Sucharow to discuss our motion for lead plaintiff. We discussed the fiduciary responsibilities we will have to the Class should the Court grant our motion, and the duties imposed on lead plaintiffs by the Reform Act. We have agreed to prosecute this action together, in the best interests of the Class.

27. We believe that the Court should appoint Lothian, Fortis Investments, Dekan, and Boston as Lead Plaintiff because they are sophisticated institutional investors with a significant interest in the outcome of the case and they have the capability and experience to oversee this litigation to a successful conclusion. The Ericsson Institutional Investor Group have ample

resources and are committed to working closely with class counsel to obtain the best possible recovery for the Class. The Ericsson Institutional Investor Group's composition reflects the composition of the Class, comprised of U.S. and non-U.S. members. The Ericsson Institutional Investor Group will continue to remain informed at all times of the status and progress of this Action, the strengths and weaknesses of the case, and the prospects for any resolution.

28. We also understand that one of the primary responsibilities of the Lead Plaintiff in overseeing the work of lead counsel is to ensure that the litigation is handled efficiently, and that the resulting fees and expenses are fair and reasonable, relative to the size, complexity and risk of the litigation.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

December <sup>27</sup>  , 2007.

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GEIK DREVER

*The City of Edinburgh Council on behalf of the  
Lothian Pension Fund*

ESMOND HAMILTON

FUND ACCOUNTING MANAGER

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

December 24, 2007.

with purpose by Sean G. G. G.



DOMINIQUE LIENART

*Fortis Investment Management N.V./S.A.*



I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

December 27<sup>th</sup>, 2007.

  
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DR. MANFRED NUSKE  
*Deka Investment GmbH*

  
\_\_\_\_\_  
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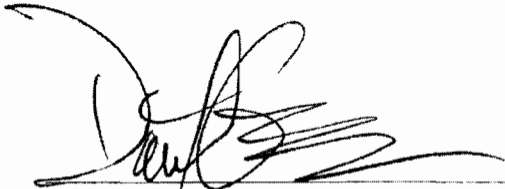
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USt-Id-Nr.:  
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Unternehmen der  
**DekaBank**  
**Deutsche Girozentrale**

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

December 21, 2007.

  
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DANIEL J. GREENE  
*State-Boston Retirement System*